

**CAPITAL POWER
CORPORATION
Privacy Policy
for Customer Information**

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CAPITAL POWER CORPORATION
PRIVACY POLICY FOR CUSTOMER INFORMATION

I. OUR COMMITMENT TO PRIVACY

This Privacy Policy is a demonstration of Capital Power’s commitment to privacy protection.

It has always been Capital Power’s priority to safeguard any information provided by our customers. We are committed to meeting, and where possible, exceeding, the requirements of all applicable privacy legislation that relates to Capital Power’s businesses (the “privacy legislation”).

This Policy will apply to Capital Power Corporation and all of its subsidiaries.

At Capital Power, customer information is maintained as strictly confidential. Unless you authorize us to release it, or release is required or permitted by law, we will not disclose information about you to any third parties. However, in order to better provide you with our services, we will share information with other Capital Power businesses or suppliers who perform services on our behalf and with whom contracts have been signed that obligate that third party to adhere to Capital Power’s privacy policies. We never sell, lease or trade information about you or your accounts to other parties, unless you authorize us to do so, or unless required or permitted by privacy legislation.

II. INTRODUCTION

The object of this Privacy Policy is to promote responsible and transparent practices in the management of Personal Information in accordance with the provisions of privacy legislation. Personal Information is information about an identifiable individual, but does not include publicly available information such as a public directory listing of your name, address or phone number nor does it include aggregated information that cannot be associated with a specific individual. Capital Power will continue to review this Privacy Policy to ensure that it remains current with changing laws and technologies.

III. SUMMARY OF PRINCIPLES

Capital Power is committed to the ten principles, which are set out in the privacy legislation. Capital Power adopts the following principles as the foundation of this Privacy Policy:

A. Accountability

Capital Power is responsible for Personal Information under its control and shall designate an individual or individuals to be accountable for Capital Power's compliance with the principles set out in this Privacy Policy and in applicable legislation.

B. Identifying Purposes

Capital Power will identify the purposes for which Personal Information is collected at or before the time the information is collected.

C. Consent

Capital Power will obtain the consent of an individual for the collection, use or disclosure of his or her Personal Information, except where inappropriate.

D. Limiting Collection

Capital Power will limit the collection of Personal Information to that which is necessary for the purposes it identifies. Capital Power will only collect information by fair and lawful means.

E. Limiting Use, Disclosure and Retention

Capital Power will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law or law enforcement and in emergency situations. Capital Power will only retain Personal Information as long as necessary for the fulfillment of those purposes or as required by law.

F. Accuracy

Capital Power will endeavour to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

G. Safeguards

Capital Power will protect Personal Information by security safeguards appropriate to the sensitivity of the information.

H. Openness

Capital Power will make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.

I. Individual Access

Upon a written request, Capital Power will inform an individual of the existence, use, and disclosure of his or her Personal Information and allow access to that information.

J. Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for Capital Power's compliance.

IV. CAPITAL POWER'S PRIVACY PRINCIPLES FOR CUSTOMER INFORMATION

A. Accountability

Capital Power is responsible for Personal Information under its control and shall designate an individual or individuals to be accountable for Capital Power 'S compliance with the principles set out in this Privacy Policy and in applicable legislation.

1. Responsibility for ensuring compliance with the provisions of this Privacy Policy rests with Capital Power's senior management, which has designated a Privacy Officer to be accountable for compliance with this Privacy Policy.
2. Capital Power is responsible for safeguarding Personal Information in its possession or control. Capital Power will use appropriate means to provide a comparable level of protection when Personal Information is being processed by a third party.
3. The Privacy Officer will have responsibility to give effect to the Privacy Policy, which responsibility shall include:
 - (a) Implementing procedures to protect Personal Information and to oversee Capital Power's compliance with this Privacy Policy;
 - (b) Establishing procedures to receive and respond to inquiries and complaints;
 - (c) Training staff and communicating to staff about Capital Power's policies and practices; and
 - (d) Developing public information to explain Capital Power's policies

and practices.

For the name, title and contact information for the person currently designated as Capital Power's Privacy Officer, refer to Appendix "A".

B. Identifying Purposes for Collection

Capital Power will identify the purposes for which Personal Information is collected at or before the time the information is collected.

1. Capital Power will document the purposes for which Personal Information is collected, and will only collect Personal Information for the identified purposes.
2. Capital Power will specify to the individual, orally, electronically or in writing, the identified purposes at or before the time Personal Information is collected. Upon request, persons collecting Personal Information will explain these identified purposes or refer the individual to a designated person within Capital Power who will explain the purposes.
3. Unless required by law or law enforcement or in emergency situations, Capital Power will not use or disclose for any new purpose Personal Information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the individual.

C. Obtaining Consent for Collection, Use or Disclosure

Capital Power will obtain the consent of an individual for the collection, use or disclosure of his or her Personal Information, except where inappropriate.

1. The consent of an individual is required for the collection, use, or disclosure of Personal Information, except where inappropriate (for example, where legal, medical or security reasons make it inappropriate). In those limited circumstances, Personal Information can be collected, used, or disclosed without the knowledge and consent of the individual.
2. Generally, Capital Power will seek consent to use and disclose Personal Information at the same time it collects the information. However, in certain circumstances, Capital Power may seek consent to use and disclose Personal Information after it has been collected.
3. In obtaining consent, Capital Power will ensure that an individual is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood by the individual.
4. Capital Power will require individuals to consent to the collection, use or disclosure of Personal Information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill identified, legitimate purposes

5. In determining the appropriate form of consent, Capital Power will take into account the sensitivity of the Personal Information and the reasonable expectations of the individuals involved. Capital Power may obtain consent from individuals in different ways. In some cases, the use of products and services by an individual will constitute implied consent for Capital Power to collect, use and disclose Personal Information for identified purposes.
6. An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Individuals may contact Capital Power for more information regarding the implications of withdrawing consent.

D. Limiting Collection of Personal Information

Capital Power will limit the collection of Personal Information to that which is necessary for the purposes it identifies. Capital Power will only collect information by fair and lawful means.

1. Capital Power will not collect Personal Information indiscriminately, and will limit the amount and type of information to that which is necessary to fulfill identified purposes.
2. Capital Power collects Personal Information primarily from its customers, but Capital Power may also collect Personal Information from other sources, including but not limited to credit bureaus, employers or personal references.

E. Limiting Use, Disclosure, and Retention of Information

Capital Power will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law or law enforcement and in emergency situations. Capital Power will only retain Personal Information as long as necessary for the fulfillment of those purposes or as required by law.

1. Capital Power will keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law. Where Personal Information has been used to make a decision about an individual, Capital Power will retain that Personal Information for a period of time that is reasonably sufficient to allow for access by the individual.
2. Capital Power will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.
3. Capital Power will maintain a record of the third parties that Personal Information is disclosed to in accordance with this Privacy Policy.

F. Accuracy of Personal Information

Capital Power will endeavour to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

1. Personal Information used by Capital Power shall be as accurate, complete and up-to-date as is necessary to minimize the possibility that inappropriate information may be used to make a decision about an individual.
2. Capital Power will update Personal Information as and when necessary to fulfill the identified purposes or upon notification by the individual.
3. Capital Power will not routinely update Personal Information, unless it is necessary to fulfill the identified purposes.

G. Security Safeguards

Capital Power will protect Personal Information by security safeguards appropriate to the sensitivity of the information.

1. Capital Power will protect Personal Information against loss or theft, as well as unauthorized access, disclosure, use, modification or destruction, through appropriate security measures. The nature of the safeguards will vary depending on the sensitivity of information collected.
2. Capital Power will ensure that its employees that have access to Personal Information respect the confidentiality of that information and comply with this Privacy Policy.
3. Contractors, consultants, and third party service providers will be contractually bound to comply with Capital Power policies that reference privacy of information.
4. Capital Power will use care in the disposal or destruction of Personal Information, to prevent unauthorized parties from gaining access to the information.

H. Openness Concerning Policies and Practices

Capital Power will make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.

1. The information that Capital Power makes available about its policies and practices will be easy to understand, and will include:
 - (a) The name or title, and the address, of the person(s) who is accountable for Capital Power's policies and practices and to whom complaints or inquiries can be forwarded;

- (b) The means of gaining access to Personal Information held by Capital Power;
- (c) A copy of any brochures or other information that explain Capital Power's policies, standards or codes;
- (d) What Personal Information is made available to related organizations; and
- (e) A description of the type of Personal Information held by Capital Power, including a general account of its use.
- (f) Capital Power will make available information to help individuals exercise choices regarding the use of their Personal Information.

I. Individual Access to Personal Information

Upon a written request, Capital Power will inform an individual of the existence, use, and disclosure of his or her Personal Information and allow access to that information.

1. Upon request, Capital Power will afford individuals a reasonable opportunity to review the Personal Information in the individual's file. Personal Information will be provided in an understandable form within a reasonable time period, and at a reasonable or no cost to the individual.
2. In certain situations as specified in the privacy legislation, Capital Power may not be able to provide access to all the Personal Information that it holds about an individual. For example, Capital Power may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Capital Power may not provide access to Personal Information if disclosure would reveal confidential commercial information, if the information is protected by solicitor client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If, upon a request being made by an individual, access to his or her Personal Information cannot be provided, Capital Power will provide the reasons for denying access.
3. In order to safeguard Personal Information, an individual will be required to provide sufficient identification information to permit Capital Power to authorize access to the individual's file. Any such information will be used only for this purpose.
4. Individuals can obtain information or seek access to their individual files by contacting a designated representative at Capital Power's business offices.

J. Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for Capital Power's compliance.

1. Capital Power will maintain procedures for addressing and responding to all inquiries, or complaints from individuals about Capital Power's handling of Personal Information.
2. Capital Power will inform individuals about the existence of these procedures as well as the availability of complaint procedures.
3. Capital Power will investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, Capital Power will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. An individual will be informed of the outcome of the investigation regarding his or her complaint.
4. Capital Power will promptly correct or complete any Personal Information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the individual's file. Where appropriate, Capital Power will notify third parties having access to the Personal Information in question about any amended information or the existence of any unresolved differences.
5. An individual that has concerns with Capital Power's privacy practices should contact Capital Power's Privacy Officer using the contact information set out in Appendix A.
6. An individual may seek advice from the Office of the Information and Privacy Commissioner at 1-888-878-4044 or generalinfo@oipc.ab.ca and, if appropriate, file a written complaint with that office. However, the individual is encouraged to use Capital Power's complaint procedures to try to resolve the matter before contacting the Privacy Commissioner.

APPENDIX “1”

Designated Privacy Officer

Responsibility for ensuring compliance with the provisions of this Privacy Policy rests with Capital Power’s Leadership Council, which shall designate one or more persons to be accountable for obtaining compliance with this Privacy Policy. Compliance responsibility will be delegated to Capital Power’s Privacy Officer.

The Privacy Officer is:

Name:	Leah Fitzgerald
Title:	Director, Ethics & Assistant Corporate Secretary
Address:	Capital Power Corporation, 10065 Jasper Avenue, Edmonton, Alberta T5J 3B1
Telephone:	(780) 392-5151
Fax:	(780) 392-5124
Email:	lfitzgerald@capitalpower.com